

EXHIBIT “B”

AFFIDAVIT OF DEBORAH Q. DANOS

STATE OF GEORGIA

COUNTY OF Fulton

AFFIDAVIT OF DEBORAH Q. DANOS

My name is DEBORAH Q. DANOS. I am over the age of eighteen years, and I am fully competent to give the testimony set forth herein. I have personal knowledge of the facts stated herein and know them to be true.

1.

I am a resident of Atlanta, Georgia. I am the President and Director of Special Affairs of the Church of Scientology of Georgia, Inc. (the "Church"). I have personal knowledge of the facts stated below and, if called upon to testify on such matters, would and could do so competently.

2.

I have been a staff member of the Church since 2005. I am also a minister of the Church. As such, I am familiar with the tenets of the Scientology religion, as well as the manner in which the Church accomplishes its religious objectives.

3.

At the date of filing of this lawsuit, the Church operated in leased space at 4480 North Shallowford Road, Dunwoody, Georgia.

4.

The Church subsequently moved its congregation to a new temporary location at 4588 Winters Chapel Road, DeKalb County, Georgia.

5.

Pending the outcome of the lawsuit, the Church intends to relocate to the building at 5395 Roswell Road, Sandy Springs, Georgia (the "Property").

6.

The Church purchased the Property in 2005 to enable it to provide a full range of Scientology religious services and to allow for future growth, which it was unable to accommodate at the Dunwoody location or at its current Winters Chapel Road location.

7.

The Property is currently developed with a 43,916 square foot office building.

8.

The building has four (4) floors, including an 11,193 square foot basement, which was used for parking by the prior owner.

9.

In order to accommodate its growing needs and to provide an adequate facility in which to exercise its religious precepts,

the Church developed plans to renovate the existing building on the Property and to convert the 11,193 square foot basement to religious uses, including the Chapel, among other uses.

10.

The Church does not propose to operate a day-care center, pre-school, kindergarten, school or boarding house on the premises.

11.

Prior to purchasing the Property, the Church confirmed that a church was a permitted use in the Property's O-I zoning designation and that the number of existing surface parking spaces would satisfy the applicable parking regulations

12.

Although a church is a permitted use in the City's O-I zoning district under the Zoning Ordinance, the Property's O-I zoning was conditioned on its use for office and accessory uses, thus preventing its use as a church without rezoning to modify and amend the existing zoning.

13.

Accordingly, on or about March 9, 2009, the Church submitted the Application, seeking a rezoning and requests for variances to the City, requesting that the City approve use of the entire

43,916 square foot building as a church, including the 11,193 square foot basement area.

14.

Each local Scientology church, such as Plaintiff, must have sufficient facilities to provide the full range of training and auditing for each gradient level on the Bridge, except for certain higher levels of spiritual advancement available only at more advanced Scientology churches.

15.

Scientology churches also hold congregational services on Sundays, religious holidays, and certain other occasions.

16.

Scientology churches are mandated to include large public display areas, including audio-visual presentations on the religion and its social betterment campaigns such as for human rights, drug and alcohol addiction prevention, literacy and scholastic improvement.

17.

At this time the Georgia Church of Scientology does not have adequate space to provide the necessary Scientology Training courses, Scientology Auditing and case supervision, Scientology dissemination materials and displays, and church administration.

18.

The Property, as limited to 32,053 square feet is inadequate to meet the needs of the Church of Scientology.

19.

The inability to utilize the entire 43, 916 square feet of the existing building owned by the Church of Scientology is far more than an inconvenience.

20.

The Church proposes locating the chapel in the basement of the building because the existing building is not engineered and constructed to allow a concentrated assembly of people on any other floor of the building.


21.

Denying the Church the ability to utilize the basement would require the Church to revise its existing renovations plans (civil plans have been completed) and re-engineer the structural support of the building, which would be prohibitively expensive.

FURTHER AFFIANT SAITH NOT.


DEBORAH Q. DANOS

Sworn to and subscribed
before me this 13th
day of December, 2010.


Notary Public

My Commission Expires:

